

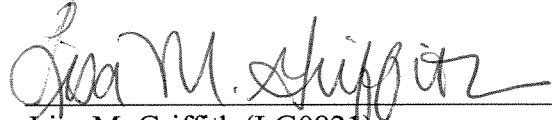
**CERTIFICATE OF SERVICE**

I hereby certify that, on May 29, 2007, I caused a true and correct copy of the annexed Memo Endorsement to be served by facsimile and regular mail on Scott B. Schwartz, attorney for plaintiff, at his office at 40 Exchange Place, Suite 2010, New York, New York 10005.

Dated: New York, New York  
May 29, 2007

MICHAEL A. CARDOZO  
Corporation Counsel of the  
City of New York  
Attorney for Defendants  
100 Church Street, Room 2-115  
New York, New York 10007  
(212) 788-0903

By:

A handwritten signature in black ink, appearing to read "Lisa M. Griffith", is written over a horizontal line.

Lisa M. Griffith (LG0821)

Assistant Corporation Counsel



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**MICHAEL A. CARDOZO**  
Corporation Counsel

**LISA M. GRUBER**  
Labor and Employment Law Division  
Phone: (212) 785-0943  
Fax: (212) 785-0940  
E-mail: lgruber@law.nyc.gov

May 24, 2007

**By Facsimile**

Honorable Laura T. Swain  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 1670  
New York, NY 10007

**MEMO ENDORSED**

IT IS ORDERED that counsel to whom this Memo Endorsement is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not fax such certification to Chambers.

Re: Vanacore v. Mattingly, et al.  
07 CV 3579 (LTS) (MHD)

Dear Judge Swain:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to represent the defendants in this action. I write to respectfully request an extension of defendants' time to respond to the complaint from May 28, until June 28, 2007. This is defendants' first request for an extension of time to respond to the complaint. Plaintiff consents to this request.

Plaintiff, a Caseworker employed by the City of New York in the Administration of Children's Services ("ACS"), brings this action pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1985, and the First and Fourteenth Amendments of the United States Constitution, alleging that, from April 1999 to the present, the defendants conspired to engage in a continuous campaign to retaliate against plaintiff for his outspoken comments about ACS' reorganization into what is called the Title Series Program, in violation of his First Amendment right to free speech. Plaintiff further claims that the retaliation violated his substantive and procedural due process rights guaranteed by the Fourteenth Amendment.

An extension of defendants' time to respond to the complaint is needed to allow this office an opportunity to investigate the allegations set forth in the complaint, to obtain

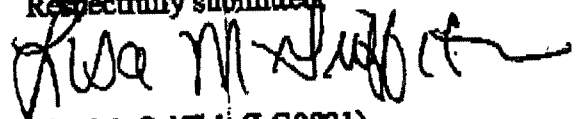
Honorable Laura T. Swain  
United States District Judge  
Vanacore v. Mattingly, et al.  
07 CV 3579 (LTS) (MHD)  
May 24, 2007  
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documents relevant to the allegations, to ascertain whether the individually named defendants have been served, to conduct interviews with the individually named defendants, to determine any representation issues with individual defendants, and to prepare an appropriate response to the complaint.

For the foregoing reasons, defendants respectfully request an extension of time from May 28, until June 28, 2007 to respond to the complaint.

Thank you for your consideration of this request.


Respectfully submitted,

  
Lisa M. Griffith (LG0821)  
Assistant Corporation Counsel

cc: Scott B. Schwartz, Esq.  
Attorneys for Plaintiffs  
(By Facsimile)

The request is granted.

SO ORDERED.

 5/25/2007  
LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE



**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007  
**FACSIMILE TRANSMISSION**

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TO:	Scott B. Schwartz	FROM:	Lisa M. Griffith Phone: (212) 788-0903 Fax: (212) 788-8877 lgriffit@law.nyc.gov
FAX #:	(212) 202-6313	DATE:	May 29, 2007

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**Re:** Vanacore v. Mattingly, et al.  
07 CV 3579 (LTS) (MHD)

**Message:** Please find the attached Memo Endorsement, wherein the Court granted defendants' request for an extension of time to respond to the Complaint, from May 28 to June 28, 2007.

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**\*\* Transmit Conf. Report \*\***

P.1

May 29 2007 10:01

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TO: Scott B. Schwartz  
 FROM: Lisa M. Griffith  
 Phone: (212) 788-0903  
 Fax: (212) 788-8877  
 Email: lgriffith@law.nyc.gov  
 DATE: May 29, 2007  
 FAX #: (212) 202-6313